

IN THE CIRCUIT COURT OF RUSSELL COUNTY, ALABAMA

TIMOTHY P. THOMASON,

Plaintiffs,

VS.

GMAC MORTGAGE  
CORPORATION,

Defendant.

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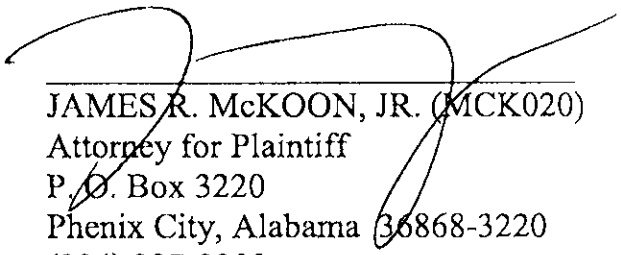
CASE NO. CV-05-131

**PLAINTIFF'S RESPONSES TO DEFENDANT'S  
SECOND SET OF REQUEST FOR ADMISSIONS**

1. Admitted.
2. Since the Defendant has thus far refused to provide a deposition date for its 30 (b)(6) Representative, Plaintiff cannot at this time admit that his damages will be limited to \$75,000.00. It is Plaintiff's intention at this time to claim no more than \$75,000.00. If discovery reveals evidence that indicates Plaintiff would be entitled to claim damages in excess of \$75,000.00, Plaintiff reserves the right to claim damages in excess of \$75,000.00.
3. Since the Defendant has thus far refused to provide a deposition date for its 30 (b)(6) Representative, Plaintiff cannot at this time admit that his damages will be limited to \$75,000.00. It is

Plaintiff's intention at this time to claim no more than \$75,000.00. If discovery reveals evidence that indicates Plaintiff would be entitled to claim damages in excess of \$75,000.00, Plaintiff reserves the right to claim damages in excess of \$75,000.00.

4. Since the Defendant has thus far refused to provide a deposition date for its 30 (b)(6) Representative, Plaintiff cannot at this time admit that his damages will be limited to \$75,000.00. It is Plaintiff's intention at this time to claim no more than \$75,000.00. If discovery reveals evidence that indicates Plaintiff would be entitled to claim damages in excess of \$75,000.00, Plaintiff reserves the right to claim damages in excess of \$75,000.00.



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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served on the following by directing same of their office addresses through first-class, United States mail, postage prepaid, on this the 3<sup>rd</sup> day of October, 2005.

Reid S. Manley, Esq.  
Robert R. Maddox, Esq.  
Burr & Forman  
420 North Twentieth Street  
Suite 3100  
Birmingham, Alabama 35203-5206

  
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OF COUNSEL